

SIDLEY AUSTIN LLP
Thomas R. Califano (24122825)
Rakhee V. Patel (00797213)
2021 McKinney Avenue, Suite 2000
Dallas, Texas 75201
Telephone: (214) 981-3300
Facsimile: (214) 981-3400
Email: tom.califano@sidley.com
rpatel@sidley.com

SIDLEY AUSTIN LLP
William E. Curtin (admitted *pro hac vice*)
Patrick Venter (admitted *pro hac vice*)
Anne G. Wallace (admitted *pro hac vice*)
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 839-5300
Facsimile: (212) 839-5599
Email: wcurtin@sidley.com
pventer@sidley.com
anne.wallace@sidley.com

*Attorneys for the Debtors
and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

PROSPECT MEDICAL HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-80002 (SGJ)

(Jointly Administered)

Related to Dkt. Nos. 633, 765, 769, 837

**NOTICE OF FILING OF SUBSTANTIALLY FINAL FORM OF SETTLEMENT AND
SUPPORT AGREEMENT**

PLEASE TAKE NOTICE that, on February 13, 2025, the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) filed the *Stipulation Between the Debtors and Medical Properties Trust, Inc. Regarding Global Settlement* [Docket No. 633] (the “Global Settlement”) with the United States Bankruptcy Court for the Northern District of Texas (the “Court”).

PLEASE TAKE FURTHER NOTICE that, on February 23, 2025, the Debtors filed (i) the *Debtors’ Motion for Entry of a Final Order (I) Authorizing (A) Postpetition Financing and (B) The Use of Cash Collateral, (II) Granting Liens and Providing Superpriority Administrative Expense Claims, (III) Granting Adequate Protection to Prepetition Lenders, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief* [Docket No. 765] (the “Junior DIP Motion”) and

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/Prospect>. The Debtors’ mailing address is 3824 Hughes Ave., Culver City, CA 90232.

(ii) the *Motion of the Debtors Pursuant to Bankruptcy Rule 9019 for Approval of Settlement with MPT* [Docket No. 769] (the “9019 Motion”) with the Court.

PLEASE TAKE FURTHER NOTICE that on March 2, 2025, the Debtors filed the proposed *Order (A) Approving Settlement with MPT and Junior DIP and (B) Granting Related Relief* [Docket No. 837-1] (the “9019/Junior DIP Order”).

PLEASE TAKE FURTHER NOTICE that the Debtors hereby file the substantially final form of Settlement and Support Agreement by and among the Debtors and MPT (the “Agreement”), attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Junior DIP Motion and the Agreement, and entry of the 9019/Junior DIP Order will be held on **March 19, 2025 at 9:30 a.m. (prevailing Central Time)** in Courtroom #1, 14th floor, 1100 Commerce Street, Dallas, Texas, 75242 before the Honorable Stacey G.C. Jernigan.

PLEASE TAKE FURTHER NOTICE that copies of the foregoing pleadings may be obtained (i) at the website established by the Debtors’ noticing agent, Omni Agent Solutions, Inc., at <https://omniagentsolutions.com/Prospect>, (ii) from the Court’s website <http://www.txnb.uscourts.gov> via ECF/Pacer, or (iii) upon request to the undersigned.

[Remainder of the page intentionally left blank.]

Dated: March 5, 2025
Dallas, Texas

/s/ Thomas R. Califano

SIDLEY AUSTIN LLP

Thomas R. Califano (24122825)

Rakhee V. Patel (00797213)

2021 McKinney Avenue, Suite 2000

Dallas, Texas 75201

Telephone: (214) 981-3300

Facsimile: (214) 981-3400

Email: tom.califano@sidley.com
rpatel@sidley.com

and

William E. Curtin (admitted *pro hac vice*)

Patrick Venter (admitted *pro hac vice*)

Anne G. Wallice (admitted *pro hac vice*)

787 Seventh Avenue

New York, New York 10019

Telephone: (212) 839-5300

Facsimile: (212) 839-5599

Email: wcurtin@sidley.com
peventer@sidley.com
anne.wallice@sidley.com

*Attorneys for the Debtors
and Debtors in Possession*

Certificate of Service

I certify that on March 5, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Thomas R. Califano
Thomas R. Califano